

September 12, 2022

Re: *JPMorgan Chase Bank, National Association, London Branch v. Tesla, Inc.*, Case
No. 1:21-cv-9441 (PGG)

Hon. Paul G. Gardephe
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, NY 10007

Dear Judge Gardephe:

We represent Plaintiff JPMorgan Chase Bank, National Association, London Branch (“JPMorgan”) in the above-captioned action (the “Action”). Pursuant to Your Honor’s individual rule I(D), we write on behalf of JPMorgan and Defendant Tesla, Inc. (“Tesla”, and together with JPMorgan, the “Parties”) to jointly request an extension of the deadline for the completion of fact discovery, which is currently scheduled for September 14, 2022, and a corresponding adjournment of all other case deadlines. The Parties are still negotiating their respective document requests and require additional time to complete their document productions, obtain discovery from third parties, and conduct depositions. The Parties therefore request an extension of the fact discovery deadline through and including March 24, 2023, as well as a corresponding adjournment of all other deadlines.

The Parties have not previously requested an extension of these deadlines.

The Parties have attached as Exhibit 1 a stipulation and proposed order and are available at the Court's convenience should it wish to discuss the Parties' request for an extension of the deadlines as addressed above. The Parties note that there is currently a pretrial conference scheduled for October 6, 2022. The Parties propose that this conference be converted to a status conference, if amenable to the Court.

Respectfully submitted,

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cc: All counsel of record (via ECF)